DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC
9742 MARYLAND AVENUE
NORFOLK, VA 23511-3095

IN REPLY REFER TO:

5090
BMEV
28 Apr 08

Ms. Joan Martin-Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

SUBJECT: CHEM FAB CORPORATION SUPERFUND SITE, DOYLESTOWN, BUCKS COUNTY, PENNSYLVANIA

Dear Ms. Martin-Banks:

This letter responds to the CERCLA § 104(e) notice letter dated December 28, 2007, that you sent requesting information from the Navy regarding the Chem Fab Corporation Site located in Doylestown, Bucks County, Pennsylvania.[1] Your letter, which was addressed to the Caretaker Site Office for the Warminster Naval Air Warfare Center (NAWC Warminster), requested responses to questions concerning the possible relationship between NAWC Warminster and the Chem Fab site, more specifically questions related to hazardous substances, pollutants, and/or contaminants that may have been transported to, stored, treated, or disposed of at the Chem Fab site. *See* Enclosure 1.

Please be advised that the Navy's responses focus solely on the former NAWC Warminster. As you are aware, that facility was closed in 1996 pursuant to the Base Realignment and Closure Act. Thus, there are no current Navy employees at the site. As indicated in the enclosed response, no direct relationship between NAWC Warminster and the Chem Fab Site, or any of the listed transporters and/or disposers of waste, was identified during the Navy's review of historical NAWC Warminster documents. This is unsurprising as, not only is NAWC Warminster no longer in existence as already mentioned, but the Navy's record

[1] The Navy's response was originally due 30 calendar days upon receipt of the letter. Because it was sent to an office that no longer existed, the Navy received it on January 23, 2008. You granted a 60-day extension from the date of request, to March 27, 2008. By e-mail of March 26, 2008, you extended the date that the Navy's response was due by 30 days. You confirmed that, because this date, April 26, 2008, would have fallen on a Saturday, the Navy may respond on April 28, 2008, the first business day thereafter.

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retention policy for transporter records is three (3) years from the date of acceptance by the original transporter. *See* Enclosure 2 (excerpts from Department of the Navy, Records Management Program, Records Management Manual [SECNAV M5210.1] (Nov. 2007)). While there are no current employees at NAWC Warminster, a former Navy employee who has general knowledge of prior waste management and disposal practices at NAWC Warminster during his tenure there from the early 1980s through closure in 1996 related no recollection of waste being transported to the Chem Fab Site. His only recollection of the named transporters/ disposers of waste listed in your letter was in the context of previous litigation at other Superfund sites involving those individuals or companies. The Navy's more specific responses to these questions are provided in Enclosure 3, including a list of all individuals consulted in the preparation of these answers.

If you require additional information or clarification, the Navy's technical point of contact is Robert Lewandowski, who may be reached at (215) 897-4908, and the Navy's legal point of contact is Suzanne Krolikowski, who may be reached at (757)445-1571 ext. 3278.

Sincerely,

Robert G. Schirmer

Robert G. Schirmer
Environmental Restoration
Product Line Coordinator

Enclosures

CC: Suzanne Krolikowski
Susan Bird
Robert Lewandowski

ENCLOSURE 1

ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 28 2007

INFORMATION REQUEST
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

U. S. Department of the Navy
Warminster Naval Air Warfare Center
c/o NAVFACENGCOM
Caretaker Site Office
P.O. Box 2609
Warminster, PA 18974-0061

FOR ACTION. RS SHARE WITH RALPH

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL # of pages ▶ 11

To BOB LEWANDOWSKI	From D. DIRZO
Dept./Agency PHILA NE	Phone #
Fax #	Fax # 215-897-4902

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Re: Required Submission of Information
Chem Fab Corporation Site, Doylestown, Bucks County, Pennsylvania

Dear Sir or Madam:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Chem Fab Corporation Site, located at 300 North Broad Street, Doylestown, Pennsylvania, (hereinafter the "Site"). The company began in 1965 as a metal etching operation. It manufactured templates from which printed circuit boards were made. It also performed electroplating. Historical spills and leaks from underground storage tanks have been documented. In 1995, the EPA conducted a removal operation that addressed process chemicals and wastes after it was determined that there was a threat to human health and the environment. Contaminants of concern at the Site include as follows: volatile organic compounds, PCBs, pesticides/herbicides, semi-volatile organics, metals and polyaromatic hydrocarbons. Investigation of the Site and evaluating it for possible inclusion on the National Priorities List is continuing.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require the U. S. Department of the Navy (hereinafter "you") to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site (see Enclosure 4: Site Location Map).

Providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under18 U.S.C. Section 1001. The information that you provide may be used by EPA in administrative, civil, or criminal proceedings.

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Instructions for responding to this required submission of information are provided below.

INSTRUCTIONS

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 1, *Business Confidentiality Claims/Disclosure to EPA Contractors & Grantees of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question(s) or subpart of the question(s) to which it responds.

4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.

5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures.

QUESTIONS

1. What was the nature of your activities resulting in the production of waste materials during the period 1965 to 1999? Please describe in detail if the nature of this activity changed from the period 1965 to 1999. Please provide a detailed explanation of these changes.

2. EPA has obtained information during the course of its investigation indicating that you may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding all wastes and by-products produced by you during the period 1965 to 1999:

   a. The nature of each "waste" (as the term "waste" is defined in paragraph 6 of the

definitions attached hereto) used including its chemical content, characteristics and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers, scrap metal). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1965 through 1999, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;

b. The annual quantity of each "waste" used or generated;

c. The process(es) in which each "waste" was used or the process(es) that generated each;

d. The types of containers used to treat, store or dispose of each "waste"; and

e. The method of treatment and/or disposal of each "waste."

3. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including your own, who during the period 1965 to 1999, may have:

   a. Disposed of or treated "waste" at the Site;

   b. Arranged for the disposal or treatment of "waste" at the Site; or

   c. Arranged for the transportation of "waste" to the Site (either directly or through transshipment points) for disposal or treatment.

4. Describe the methods used by you to dispose of and/or treat "waste" during the period 1965 to 1999.

5. If your response to Question 4 includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain the arrangements for those transactions and provide documentation that confirms the nature of those transactions.

6. Did you make arrangements with any of the following companies or individuals to transport and/or dispose of wastes? Manfred De Rewal, Echo Corporation, Revere Chemical Company, Revere Chemical Transport, De Rewal Chemical Company, Inc., Boarhead Corporation, East Falls Corporation, Advanced Environmental Technology Corporation ("AETC"), the Envirotech Company, Environmental Chemical Control, Inc., Jonas Waste Removal, Marvin Jonas, Inc., Marvin Jonas, Simon Wrecking, Simon Resources Inc., Sam Simon, Chem Fab Corporation, Hans Richard Becker, Gulbrandsen Co., Chemical Leaman Tank Lines Inc., Coastal Tank Lines Inc., Macs Associates, and Matlack Transportation Co.

If so, identify:

a. The persons with whom you, or such other persons, made such arrangements;

b. Every date on which such arrangements took place;

c. For each transaction, the nature and quantity of the "waste" including the chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

d. Precise locations at which each "waste" was disposed or treated;

e. The persons who selected the Site as the place at which "waste" was disposed or treated;

f. The final disposition of each of the "wastes" involved in such transactions; and

g. The names of employees, officers, owners and agents for each transporter.

7. For each and every instance in which you arranged for disposal or treatment of "waste" at the Site, identify:

a. The characteristics, physical state (i.e., liquid, solid) and chemical composition of each "waste";

b. The persons who supplied you with "waste" material disposed or otherwise handled by you;

c. How such "wastes" were used, treated, transported, disposed or otherwise handled by you;

d. When and where such "wastes" were used, treated, transported, disposed or otherwise handled by you;

e. The quantity (number of loads, gallons, drums) of the "wastes" which were used, treated, transported, disposed or otherwise handled by you; and

f. Any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with you to generate, treat, store, transport or dispose of "wastes" at the Site.

8. Provide the names, titles and areas of responsibility of any persons, including all present and former employees, who may be knowledgeable of your waste disposal practices, whether or not involving disposal at the Site, during the period 1965 to 1999. Include current addresses and dates of birth for former employees.

9. Describe any permits or applications and any correspondence between you and any

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regulatory agencies regarding "wastes" transported to or disposed of at the Site.

10. Provide copies of any correspondence between you and any third party regarding "wastes" transported to or disposed of at the Site.

11. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal or transportation of such "wastes" to the Site.

12. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

13. For each question, provide the name, title, area of responsibility, current address and telephone number of all persons consulted in the preparation of the answers.

14. If you have reason to believe that there may be persons able to provide more detailed or complete responses to any question contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons and describe the additional information or documents they may have.

15. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained.

16. If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to or release of contamination at the Site, please provide such information. The information you provide in response to this request should include each party's name, address, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

You must respond in writing to this required submission of information within **thirty (30) calendar days** of your receipt of this letter.

If, for any reason, you do not provide all information responsive to this letter, your answer to EPA must: (1) describe specifically what was not provided, and (2) provide EPA an appropriate reason why the information was not provided.

All documents and information should be sent to:

Ms. Joan Martin-Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

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This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any PRP Search questions concerning this matter, please contact Civil Investigator Joan Martin-Banks at (215) 814-3156. If you have any legal questions, please contact Assistant Regional Counsel Leigh Rendé of EPA's Office of Regional Counsel at (215) 814-2668.

Sincerely,

Laura B. Janson

Laura B. Janson, Chief
Cost Recovery Branch

Enclosures:
1. Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
2. Definitions
3. List of Contractors That May Review Your Response
4. Site Location Map

cc: Leigh Rendé, Esq., EPA (3RC41)
Huu Ngo, EPA (3HS21)
Craig Olewiler, PADEP
Richard Mach, Navy H.O.

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Enclosure 1

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See Enclosure 3) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. Section 9604(e)(7) and EPA's regulations at 40 C.F.R. Section 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure 3, you must notify EPA in writing at the time you submit such documents.

Enclosure 2

Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.

2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, interoffice and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.

3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 [of the U.S. Code], (b) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of [CERCLA], (c) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 [of the U.S. Code]. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral

abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. Section 2011 et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act (42 U.S.C. Section 2210), or, for the purposes of section 9604 of [CERCLA] or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under sections 7912(a)(1) or 7942(a) of [CERCLA], and (d) the normal application of fertilizer.

6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, hazardous materials, pollutants, and contaminants, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.

7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, holding companies.

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Enclosure

[rev. 10/2007]

List of Contractors That May Review Your Response

- Chenega Integrated Systems, LLC
  Contract #EP-S3-04-01
  Subcontractors:
  DPRA
  Tri-State Enterprise Corporation

- Tetra Tech EM, Inc.
  Contract #68-S3-0002
  Subcontractor:
  Eagle Instruments, Inc.

- Ecology and Environment, Inc.
  Contract #68-S3-0001
  Subcontractor:
  S & S Engineers, Inc.

- IT Corporation
  Contract #68-S3-00-06
  Subcontractors:
  Weavertown Environmental Group
  Environmental Restoration Company

- Earth Tech, Inc.
  Contract #68-S3-00-07
  Subcontractors:
  Industrial Marine Services, Inc.
  Cline Oil
  Hertz Equipment Rental

- EA Engineering, Science and Technology, Inc.
  Contract #EP-S3-07-07
  Subcontractor:
  URS

- Tetra Tech NUS, Inc.
  Contract #EP-S3-07-04

- Hydrogeologic (HGL)
  Contract #EP-S3-07-05
  Subcontractor: CH2MHill

- CDM-Federal Programs Corporation
  Contract # EP-S3-07-06
  Subcontractors:
  L. Robert Kimball & Associates Inc.
  Page Technologies Inc.
  Avatar Environmental LLC
  Terradon Corporation

- Eisenstein Malanchuck, LLP
  Contract #EP-W-06-014
  Subcontractors:
  James C Hermann & Associates
  R. M. Fields International, LLC
  McRae & Company, Inc.

- Tech Law, Inc.
  Contract #EP-S3-04-03

- WRS Infrastructure & Environment, Inc. –
  Contract # 68-S3-03-02

- Kemron Environmental Services
  Contract # 68-S3-03-05

- Industrial Marine Services, Inc.
  Contract # 68-S3-03-03

- Guardian Environmental Services, Inc.
  Contract # 68-S3-03-04

- Booz-Allen & Hamilton
  Contract # GS-10F-0090J (GSA Schedule)

- Booz-Allen & Hamilton
  Contract # GS-35F-0306J (GSA Schedule)

- Artic Slope Regional Corporation
  Contract # EP-W-05-052
  Subcontractor: Booz-Allen & Hamilton

List of Inter-Agency Agreements

- General Services Administration
  CERCLIS/FCT/ICIS
  Contractor: Booz-Allen & Hamilton

- General Services Administration
  Breslube Penn Superfund Site
  Contractor: Booz-Allen & Hamilton

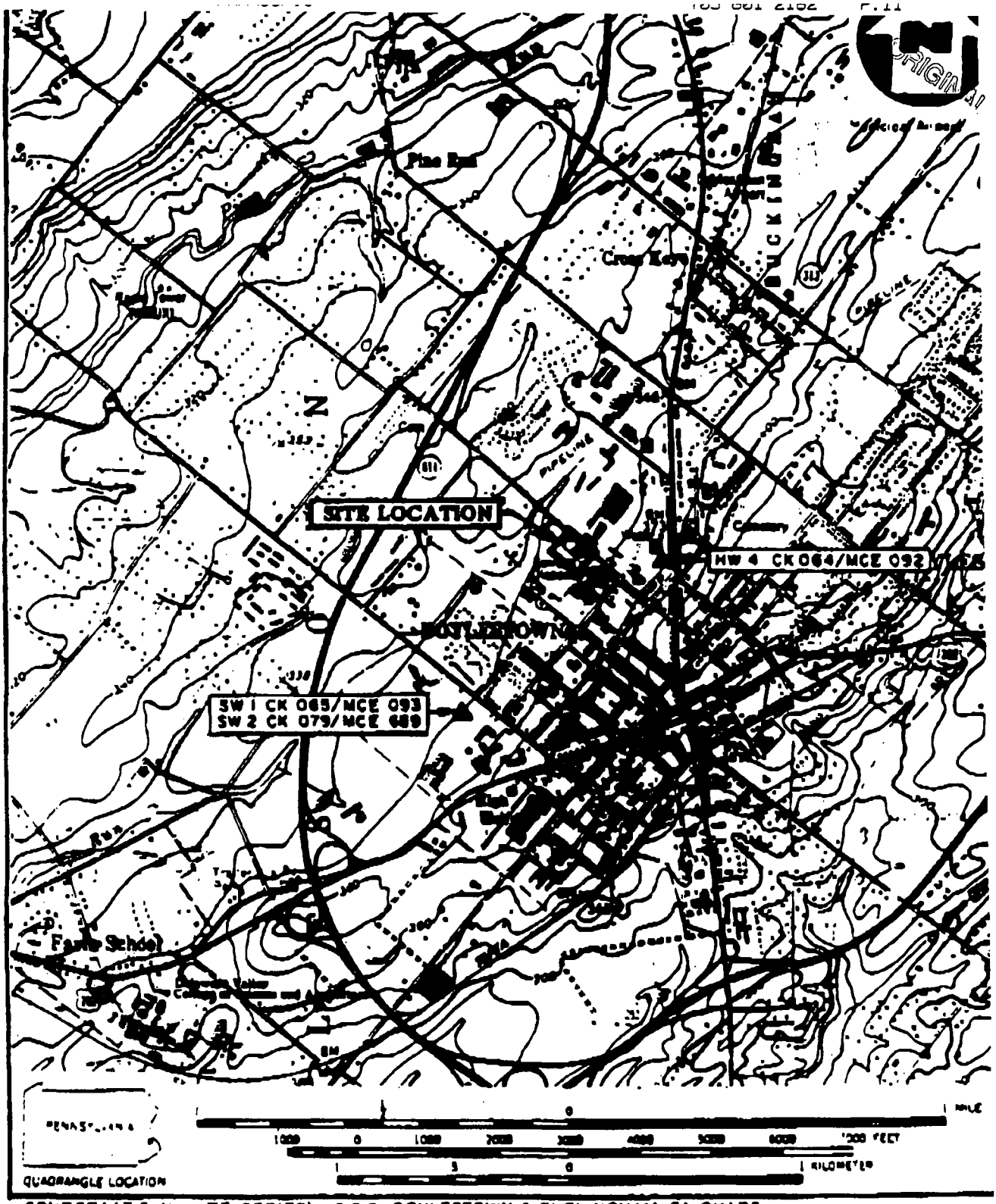
List of Cooperative Agreements

- National Association of Hispanic Elderly
  #CQ-822511

- AARP Foundation (Senior Environmental Employment)

  #824021
  #823951

- National Older Work Career Center, Inc.
  (NOWCC)- #CQ-830919



SOURCE: (7.5 MINUTE SERIES) U.S.G.S. DOYLESTOWN & BUCKINGHAM, PA QUADS.

OFF-SITE SAMPLE LOCATIONS
CHEM-FAB, DOYLESTOWN, PA
SCALE 1: 24000

FIGURE 5.2

NUS CORPORATION

ENCLOSURE 2

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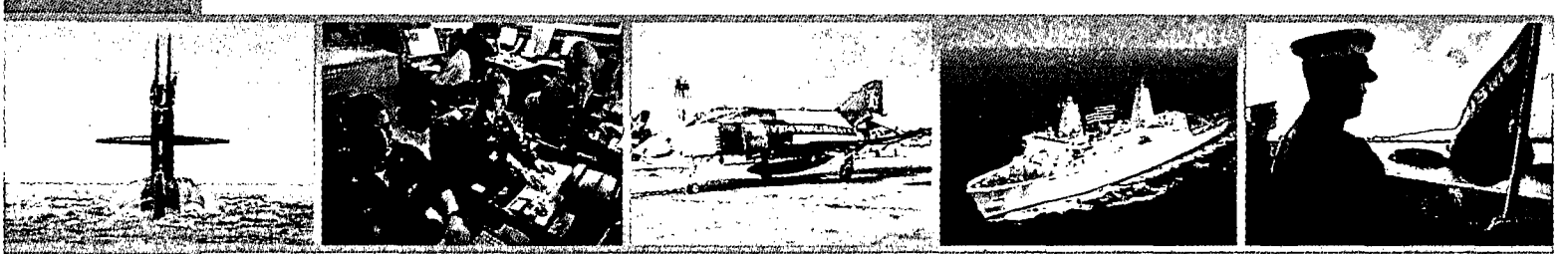
THE SECRETARY OF THE NAVY

SECNAV M-5210.1
NOVEMBER 2007 (REV.)

DEPARTMENT OF THE NAVY
RECORDS MANAGEMENT PROGRAM

RECORDS MANAGEMENT MANUAL



PUBLISHED BY
THE DEPARTMENT OF THE NAVY CHIEF INFORMATION OFFICER
NOVEMBER 2007REVISION

Destroy 2 years after approval or disapproval. (N1-NU-89-4)

b. Correspondence or Memoranda. Records pertaining to awards from other government agencies or private organizations.

Destroy when 2 years old. (N1-NU-89-4)

2. Length of Service and Sick Leave Awards File. Records including correspondence, memoranda, reports, computations of service and sick leave, and list of awardees.

Destroy when 1 year old. (N1-NU-89-4)

3. Letters of Commendation and Appreciation. Copies of letters recognizing length of service and retirement and letters of appreciation and commendation for performance. (Exclude copies filed in the Official Personnel Folder (OPF).)

Destroy when 2 years old. (N1-NU-89-4)

4. List or Indexes to Agency Award Nominations. List of nominees and winners and indexes of nominations.

Destroy when superseded or obsolete. (N1-NU-89-4)

5. Departmental Level Awards Files. Records relating to awards made at the departmental level or higher (Presidential, Secretarial, etc.).

PERMANENT. Transfer to FRC when 4 years old. Offer to NARA when 20 years old. (N1-NU-89-4)

SSIC 5062
CHRISTENING CEREMONIES AND PROCEDURES RECORDS

Name and Sponsor Files. General Correspondence pertaining to Christening Ceremonies.

PERMANENT. Retire to WNRC when 4 years old. Transfer to NARA when 20 years old. (N1-NU-89-4)

SSIC 5070
LIBRARIES AND LIBRARY SERVICES RECORDS

These Records are Accumulated by Librarians or Others Responsible for Maintaining Library Collections.

1. Library Catalog and Source Cards, List Books, Magazines, Reports, and Other Library Materials.

Destroy immediately after all copies of publications are withdrawn from the library collection. Transfer catalog cards for any material transferred to NARA with records. (N1-NU-89-4)

2. Shelf Lists. Records of all documents making up library collections.

Destroy when library is disestablished. (N1-NU-89-4)

3. Chargeout Records. Chargeout cards or other records of material on loan, waiting lists, overdue notices, and other similar control records.

Destroy when document is returned or inventoried, after chargeout card is filled, or after appropriate action has been taken. (N1-NU-89-4)

4. Inter-Library Loan Logs or Other Similar Records.

Destroy when 4 years old. (N1-NU-89-4)

5. Technical Publications Library (TPL) Records. Files consist of publications designated as Code 4 publications in the Navy (forms and publications) supply system and other similar non-Communications Material System (CMS)-distributed publications and accumulated by commands and by other naval activities and offices.

a. Transaction Files. Copies of all correspondence pertaining to the handling of the TPL publications, including local memoranda, allowance lists, and change entry certification forms.

Destroy when 2 years old. (N1-NU-89-4)

b. Custody Record Files. Files of TPL catalog cards for each basic publication under control in the TPL.

Destroy 2 years after publication is transferred, lost or destroyed. (N1-NU-89-4)

c. Change Entry Certification Forms. Upper portion of form used as receipt for change. (See also SSIC 5070.5a.)

Destroy when date of change entry is made on TPL catalog card. (N1-NU-89-4)

d. Inventory Reports of TPL Material on board.

Destroy when 2 years old. (N1-NU-89-4)

SSIC 5080
CIVIL AFFAIRS, MILITARY GOVERNMENT, RECORDS

1. The U.S. Army has Lead Responsibility for the DOD Civil Affairs and Military Government Program.

Apply Army Record Information Management System (ARIMS) (AR) 25-400-2 for descriptions of records and disposal authorities. (N1-NU-89-4

SSIC 5090
GENERAL ENVIRONMENTAL PROTECTION RECORDS

1. Drinking Water Records. Forms and correspondence documenting results of tests, analyses, and measurements.

a. Bacteriological Results.

Destroy when 5 years old. (N1-NU-89-4)

b. Chemical/Physical Results.

Destroy when 10 years old. (N1-NU-89-4)

2. Hazardous Waste Records.

a. Manifests and Copies of Reports Submitted to Environmental Protection Agency (EPA).

Destroy when 3 years old. (N1-NU-89-4)

b. Test Results or Waste Analyses.

Destroy 3 years after waste is sent to a Treatment Storage Disposal (TSD) facility. (N1-NU-89-4)

c. Transporter Records. Copies of manifests signed by the generator, transporter and TSD facility owner/operator.

Destroy 3 years from date of acceptance by original transporter. (N1-NU-89-4)

d. Inspection and Maintenance Records of PCB Transformers or Electromagnets.

Destroy 3 years after disposal of transformer/electromagnet. (N1-NU-89-4)

e. PCB Inventory, Validation and Accountability Records.

Destroy when 3 years old. (N1-NU-89-4)

3. Hazardous Substance Records. Includes reports and other records required by the Comprehensive Environmental Response Compensation Liability Act.

Retire to nearest FRC 3 years after completion of response action. Destroy when 50 years old. (N1-NU-89-4)

a. Management Plans and support documentation.

Destroy when superseded or obsolete whichever is later. (N1-NU-89-4)

4. General Environmental Reports and Documentation Not Covered Elsewhere in this Manual. Includes environmental assessments; environmental impact statements; life-cycle analyses; documentation of compliance/noncompliance; documentation required by the Army Corps of Engineers; site inspections; communications with non-DOD Federal, State, Local and Foreign environmental authorities; and all other documentation required by law, regulation, and executive order, including reports to the EPA. Records include the affect of activities on air quality; tideland and fresh water wetland resources; wildlife; protected threatened, and endangered species; woodland resources; coastal and contiguous zone waters; noise levels; farm land; private property; land/property of historical/archeological value; and toxic waste sites. Note: current edition of OPNAV INSTRUCTION 5090.1 contains up-to-date lists of current laws, executive orders, regulations, and directives.

Retire to nearest FRC when 5 years old. Destroy when 30 years old. (N1-NU-89-4)

5. Control of Lead and Copper. Marine Corps owned and operated public water systems in the United States subject to the Lead and Copper Control requirements must retain original records of all sampling data and analysis, reports, surveys, letters, evaluations, schedules, state determinations, and any other information requires in 40 CFR 141.81 through 40 CFR 141.88.

(Note: Electronic version of records created by electronic mail and word processing application: Delete when file copy is generated or when no longer needed for reference or updating.)

Retire to FRC after 3 years and destroy after 12 years. (N1-NU-00-1)

SSIC 5100
SAFETY AND OCCUPATIONAL HEALTH RECORDS

The records described in this paragraph are accumulated throughout the DON by activities and offices concerned with safety matters for Military and Civilian Personnel. (See SSIC 6200.2.)

1. General Correspondence Files of Activities and Offices and Other Organizational Units Concerned with Safety Matters relating to Civilian and Military Personnel.

Destroy when 2 years old. (N1-NU-89-4)

2. Safety Engineers Reports of Inspection and related Correspondence and Papers Reflecting Recommendations and Results.

a. Naval Activities.

Destroy when 3 years old or upon discontinuance of facility, whichever is earlier. (N1-NU-89-4)

b. Privately Owned Facilities Assigned Security Cognizance by DON.

Destroy when 4 years old or security cognizance is terminated, whichever is earlier. (N1-NU-89-4)

ENCLOSURE 3: RESPONSE TO EPA QUESTIONS REGARDING THE FORMER WARMINSTER NAVAL AIR WARFARE CENTER (NAWC WARMINSTER)

1) **What was the nature of your activities resulting in the production of waste materials during the period 1965 to 1999? Please describe in detail if the nature of this activity changed from the period 1965 to 1999. Please provide a detailed explanation of these changes.**

While the Navy believes a response is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6, the Navy provides the following general information about the NAWC Warminster. During the period 1945 to 1999, the United States Navy operated a research and development activity at the site under various names including Naval Air Development Center (NADC) and Naval Air Warfare Center, Aircraft Division, Warminster (NAWC-AD). The activity was affected by the Base Realignment and Closure Acts of 1993 and 1995 and was operationally closed in 1996.

The Navy has located two documents that may contain general information about hazardous waste management at the former NAWC Warminster: (1) Chapter 3 of the Navy's Base Closure Plan for NAWC Warminster, which has a general discussion of Hazardous Waste Management at the former NAWC Warminster; and (2) the section of the Draft Environmental Impact Statement for Disposal and Reuse of Naval Air Warfare Center Aircraft Division (NAWCAD), Warminster, Pennsylvania (Dec. 1996) which contains a discussion of petroleum and hazardous substances at NAWCAD. These are attached.

2) **EPA has obtained information during the course of its investigation indicating that you may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding all wastes and by-products produced by you during the period 1965 to 1999.**

   a) **The nature of each "waste" (as the term "waste" is defined in paragraph 6 of the definitions attached hereto) used including its chemical content characteristics and physical state (i.e., liquid, solid, gas or in the form of contaminated rags, cups, containers, scrap metal). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1965 through 1999, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the relevant time period, *see* Response to Question 1 above, the Navy does not have documentation or information regarding each "waste" that may have been used during the relevant period. Not only has NAWC Warminster been decommissioned for over 10 years, but the Navy's record retention policy for transporter records is three (3) years from the date of acceptance by the original transporter. *See* Department of the Navy, Records Management Program, Records Management Manual [SECNAV M5210.1] at III-5-7 (Nov. 2007)).

b) The annual quantity of each "waste" used or generated;

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the relevant time period, *see* Response to Question 1 above, the Navy does not have documentation or information regarding the annual quantity of wastes that may have been used or generated during the relevant period, *see* Response to Question 2a.

c) The process(es) in which each "waste" was used or the process(es) that generated each;

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the relevant time period, *see* Response to Question 1 above, the Navy does not have documentation or information regarding the processes in which each waste might have been used or the processes that may have generated waste(s), *see* Response to Question 2a.

d) The types of containers used to treat, store or dispose of each "waste;" and

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the

relevant time period, *see* Response to Question 1 above, the Navy does not have documentation regarding containers that may have been used to treat, store, or dispose of each waste, *see* Response to Question 2a.

e) **The method of treatment and/or disposal of each "waste".**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the listed transporters and/or disposers of waste. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the relevant time period, *see* Response to Question 1 above, the Navy does not have documentation regarding the method of treatment and/or disposal of each "waste" that may have been treated and/or disposed, *see* Response to Question 2a.

3) **Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including your own, who during the period 1965 to 1999, may have:**

a) **Disposed of or treated "waste" at the Site;**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

b) **Arranged for the disposal or treatment of "waste" at the Site; or**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

c) **Arranged for the transportation of "waste" to the Site (either directly or through transshipment points) for disposal or treatment.**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

4) **Describe the methods used by you to dispose of and/or treat "waste" during the period 1965 to 1999.**

While the Navy believes a response is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6, the Navy provides the following general information about the hazardous waste practices at NAWC Warminster between the early 1980s and 1996, when NAWC Warminster was decommissioned.

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Disposal of any wastes that may have been generated at NADC/NAWC-AD pursuant to its operations was in accordance with applicable laws and regulations in effect at the time of disposal. No detailed records, however, are currently available. *See* Response to Question 2a. The Navy has located two documents that may contain general information about hazardous waste management at the former NAWC Warminster: (1) Chapter 3 of the Navy's Base Closure Plan for NAWC Warminster, which has a general discussion of Hazardous Waste Management at the former NAWC Warminster; and (2) the section of the Draft Environmental Impact Statement for Disposal and Reuse of Naval Air Warfare Center Aircraft Division (NAWCAD), Warminster, Pennsylvania (Dec. 1996) that contains a discussion of petroleum and hazardous substances at NAWCAD. These are attached.

5) **If your response to Question 4 includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain the arrangements for those transactions and provide documentation that confirms the nature of those transactions.**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Moreover, while the Navy may be able to provide general information regarding its waste management during some of the relevant time period, *see* Response to Question 1 above, the Navy does not have documentation regarding the transportation and/or disposal of wastes that may have been used or generated during the relevant period, *see* Response to Question 2a.

6) **Did you make arrangements with any of the following companies or individuals to transport and/or dispose of wastes? Manfred De Rewal, Echo Corporation, Revere Chemical Company, Revere Chemical Transport, De Rewal Chemical Company, Inc., Boarhead Corporation, East Falls Corporation, Advanced Environmental Technology Corporation ("AETC") the Envirotech Company, Environmental Chemical Control, Inc., Jonas Waste Removal, Marvin Jonas Inc., Marvin Jonas, Simon Wrecking, Simon Resources Inc., Sam Simon, Chem Fab Corporation, Hans Richard Becker, Gulbrandsen Co., Chemical Leaman Tank Lines Inc., Coastal Tank Lines Inc., Macs Associates, and Matlack Transportation Co.**

No such arrangements have been identified. Navy records do not indicate that NAWC Warminster had a business relationship with any of the transporters and/or disposers of waste listed in this question.

If so, identify:

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a) **The persons with whom you, or such other persons, made such arrangements;**
b) **Every date on which such arrangements took place;**
c) **For each transaction, the nature and quantity of the "waste" including the chemical content, characteristics, physical state (i.e., liquid, solid) and the process for which the substance was used or the process that generated the substance;**
d) **Precise locations at which each "waste" was disposed and treated;**
e) **The persons who selected the Site as the place at which "waste" was disposed or treated;**
f) **The final disposition of each of the "wastes" involved in such transactions; and**
g) **The names of employees, officers, owners and agents for each transporter.**

A response is unnecessary to Questions 6a through 6g as Navy records do not indicate that NAWC Warminster had a business relationship with Chem Fab Corp or any of the listed transporters and/or disposers of waste.

7) **For each and every instance in which you arranged for disposal or treatment of "waste" at the Site, identify:**

a) **The characteristics, physical state (i.e., liquid, solid) and chemical composition of each "waste;"**
b) **The persons who supplied you with "waste" material disposed or otherwise handled by you;**
c) **How such "wastes" were used, treated, transported, disposed or otherwise handled by you;**
d) **When and where such "wastes" were used, treated, transported, disposed or otherwise handled by you;**
e) **The quantity (number of loads, gallons, drums) of the "wastes" which were used, treated, transported, disposed or otherwise handled by you; and**
f) **Any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with you to generate, treat, store, transport or dispose of "wastes" at the Site.**

A response to these questions (Questions 7a-f) is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

8) **Provide the names, titles and areas of responsibility of any persons, including all present and former employees, who may be knowledgeable of your waste**

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disposal practices, whether or not involving disposal at the Site, during the period 1965 to 1999. Include current addresses and dates of birth for former employees.

The following are former Navy employees who worked at NAWC Warminster during some portions of the relevant time period and who may be knowledgeable about the ***general*** waste disposal practices there. Neither have any knowledge that NAWC Warminster arranged for disposal or treatment of "waste" at the Site or had a business relationship with Chem Fab Corp or any of the transporters and/or disposers of waste listed in Question 6. Both individuals have authorized the release of their home information:

Tom Ames
[redacted]

Mr. Ames is a retired Navy employee and former NAWC Warminster employee from the early 1980s through closure of NAWC Warminster in 1996, was the Deputy Public Works Officer and the BRAC Environmental Coordinator at NAWC Warminster during this period.

Joseph Cody
[redacted]

Mr. Cody is a retired Navy employee and former NAWC Warminster employee. Mr. Cody was the Base Transition Coordinator during some portion of the relevant time period.

9) **Describe any permits or applications and any correspondence between you and any regulatory agencies regarding "wastes" transported to or disposed of at the Site.**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

10) **Provide copies of any correspondence between you and any third party regarding "wastes" transported to or disposed of at the Site.**

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

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11) Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal or transportation of such "wastes" to the Site.

A response to this question is unnecessary as Navy records do not indicate that NAWC Warminster arranged for disposal or treatment of "waste" at the Site.

12) Provide the name, title, address and telephone number of the person answering these questions on behalf of the respondent.

Robert G Schirmer, P.E.
Environmental Business Line
ER Product Line Coordinator
NAVFAC Mid-Atlantic
9742 Maryland Ave
Norfolk, VA 23511
Phone: (757) 444-2911

Suzanne Krolikowski
Assistant Counsel
Office of Counsel, NAVFAC MIDLANT
9742 Maryland Avenue (A-81, 2nd floor)
Norfolk, VA 23511-3095
Phone: 757-445-1571, ext. 3278

The following individuals provided background information for questions 1 and 4:

Robert F. Lewandowski
BRAC Environmental Coordinator
Navy PMO Northeast
4911 South Broad Street
Bldg 679, PNBC
Philadelphia, PA 19112
Phone: (215) 897-4908

* Tom Ames
[redacted]

* Mr. Ames is a retired Navy employee, former Warminster employee from early 1980s through closure of Warminster in 1996, was the Deputy Public Works Officer and the BRAC Environmental Coordinator at Warminster during this period. ***Please note*** that this is a home address and phone number and that Mr. Ames authorized the use of this information in this response.

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13) **For each question, provide the name, title, area of responsibility, current address and telephone number of all persons consulted in the preparation of the answers.**

The following persons were consulted in the preparation of the answers to these questions. The majority had no knowledge or information regarding the hazardous waste practices at NAWC Warminster. Moreover, none of these individuals had any information or knowledge that NAWC Warminster had arranged for disposal or treatment of "waste" at the Site.

The following 2 individuals provided general background material for question 1:

Robert F. Lewandowski
BRAC Environmental Coordinator
Navy PMO Northeast
4911 South Broad Street
Bldg 679, PNBC
Philadelphia, PA 19112
Phone: (215) 897-4908

* Tom Ames
[redacted]

* Mr. Ames is a retired Navy employee, former Warminster employee from early 1980s through closure of Warminster in 1996, was the Deputy Public Works Officer and the BRAC Environmental Coordinator at Warminster during this period. ***Please note*** that this is a home address and phone number and that Mr. Ames authorized the use of this information in this response.

The following individuals performed searches in the Navy's files for responsive documents or information, but did not find any responsive documents or information:

Suzanne Krolikowski
Assistant Counsel
Office of Counsel, NAVFAC MIDLANT
9742 Maryland Avenue (A-81, 2nd floor)
Norfolk, VA 23511-3095
Phone: (757) 445-1571, ext. 3278

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Bonnie Capito
Librarian and NARA Certified Records Manager NAVFAC Atlantic
Environmental
6506 Hampton Blvd.
Norfolk, VA 23508
Phone: (757) 322-4785

Susan M. Bird
Associate Counsel (Environmental)
Office of Counsel (AIR-11.4 - Command Support)
Naval Air Systems Command (NAVAIR)
47085 Buse Road, Bldg 462, Rm 4
Patuxent River, MD 20670-1574
Phone: (301) 757-5980

Stuart Paul
NAVAIR BRAC Office (AIR-6.0B)
47038 McLeod Road, Bldg 448
Patuxent River MD 20670
Phone: (301) 757-3067

The individuals listed below were contacted but had no relevant knowledge or information:

William Mohn
Associate Counsel (Industrial Operations & Fleet Readiness Centers)
Office of Counsel (AIR-11.4 - Command Support)
Naval Air Systems Command (NAVAIR)
47085 Buse Road, Bldg 462, Rm 4
Patuxent River, MD 20670-1574
Phone: (301) 757-5982

James M. Carr, Counsel
Naval Air Warfare Center, Aircraft Division
Bldg 435 Suite A
47076 Liljencrantz Road
Patuxent River MD 20670-1550
Phone: (301) 342-9562

Kathryn Rada, NAVAIR Records Officer
21945 Nickels Rd., Building 2123
Patuxent River MD 20670
Phone: (301) 342-1266

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David Mason
NAVAIR Central Contract Records File Coordinator
47227 Whalen Road, Bldg 515
Patuxent River MD 20670
Phone: (301) 757-2538

Linda Nelson
NAVAIR BRAC Officer
Building 463 Room 135
22514 McCoy Road
Patuxent River MD 20670
Phone: (301) 342-7440

Regina Hansell,
NAWCAD Comptroller's Office (former Warminster employee)
47110 Liljencrantz Road, Bldg 439
Patuxent River MD 20670
Phone: (301) 342-9645

CAPT Avgi Ioannidis
Chief of Staff for Commander, Fleet Readiness Center (COMFRC)
47038 McLeod Rd, Building 448
Patuxent River MD 20670
Phone: (301) 757-3004

David Krause
NAVFAC Mid - Atlantic
Environmental Planning & Conservation Division
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Phone: (757) 444-1028

Ralph Lombardo
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BRAC Program Management Office (PMO)
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Todd Bober
BRAC Program Management Office (PMO)
4911 South Broad Street
Bldg 679, PNBC
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Nina Johnson
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Virginia Avenue & Persey Street
Norfolk, VA 23511
Phone: (757) 444–0717

Jim Colter
Building Z-144, 1st Flr, Room 109
Virginia Avenue & Persey Street
Norfolk, VA 23511
Phone: (757) 444-0825

* Joseph Cody
[redacted]

* Mr. Cody is a retired Navy employee and former Warminster employee. Please note that this is a home address and phone number; Mr. Cody authorized the use of this information in this response.

Debra Felton (former Navy employee at NAVFAC, NorthDiv, Philadelphia)
General Services Administration
Strawbridge Building
20 N. 8th Street
Philadelphia, PA 19107
Phone: (215) 446-4545

Carolyn Riemer (former Navy employee)
Attorney
Defense Logistics Agency
Philadelphia, PA
Phone: (215) 737-2644 (work)

Francisco A. La Greca, P.E. (former Navy employee)
DCMA Industrial Analysis Center
Homeland Defense Analysis Team
Phone: (215) 737-0664

Al Haring (former Navy employee)
McGuire AFB
305th AMW/JB-PIO
Phone: (609) 754-2015

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14) **If you have reason to believe that there may be persons able to provide more detailed or complete responses to any question contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses and telephone numbers of such persons and describe the additional information or documents they may have.**

None identified.

15) **For each and every question contained herein, if information or documents Responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas, of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained.**

None identified.

16) **If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to or release of contamination at the Site, please provide such information. The information you provide in response to this request should include each party's name, address, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

None identified.

ATTACHMENT TO ENCL 3

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Prepared for
Department of the Navy
Northern Division
Naval Facilities Engineering Command

in accordance with
Chief of Naval Operations Instruction 5090.1B

pursuant to
National Environmental
Policy Act Section 102(2)(C)

Draft Environmental Impact Statement

Disposal and Reuse
of
Naval Air Warfare Center Aircraft Division
Warminster, Pennsylvania

December 1996

Please contact the following person
with comments and questions:

Kurt C. Frederick
Phone: (610) 595-0728
Fax: (610) 595-0778
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113

3.10 Petroleum and Hazardous Substances

3.10.1 Hazardous Waste/Substance Management

NAWCAD has a Hazardous Material Control and Management Program, consisting of a Hazardous Material Control Committee and an authorized Hazardous Material Use List (BRAC Cleanup Team and EA Engineering, March 1995). This program includes a continuing review of materials presently in use in order to identify less hazardous substitutes. An inventory of laboratory chemicals, quantities, and locations is maintained at the activity. In addition, NAWCAD undergoes periodic environmental compliance audits that assess compliance with applicable federal and state environmental regulations. Environmental inspections are performed by the Northern Division of the Naval Facilities Engineering Command, USEPA, and the Pennsylvania Department of Environmental Protection.

NAWCAD had been classified as a Large Quantity Generator (RCRA Hazardous Waste Generator No. PA6170024545) under the Resource Conservation and Recovery Act (RCRA) (BRAC Cleanup Team and EA Engineering, March 1995). A Large Quantity Generator is defined as a facility that generates over 1,000 kg per month of acutely hazardous waste. Hazardous waste generation has been steadily declining however, and will eventually be reduced to zero (other than small amounts generated from routine maintenance operations) (Kurdziel, August 31, 1995). Currently, wastes generated by the facility are disposed of by Defense Reutilization and Marketing Office (DRMO) contractors in compliance with RCRA and the Pennsylvania Department of Environmental Protection regulations.

3.10.2 Hazardous Waste Remediation

Information contained in this section was based upon the *Environmental Baseline Survey* (EA Engineering, 1995), the *Base Realignment and Closure Cleanup Plan* (BRAC Cleanup Team and EA Engineering, 1995), and the CERFA report prepared for NAWCAD (US Navy, 1993). These documents summarize the status of the facility's environmental restoration and associated environmental compliance programs and present a comprehensive strategy for implementing response actions necessary to protect human health and the environment and facilitate property transfer. Environmental restoration programs at NAWCAD include the Installation Restoration Program (IRP) and Resource Conservation and Recovery Act (RCRA) Corrective Action Program. Compliance programs include regulation of:

- Underground Storage Tanks (USTs) per RCRA Subpart I and Pennsylvania Department of Environmental Protection regulations;
- Polychlorinated Biphenyls (PCBs) by the Toxic Substances Control Act (TSCA);

- Air emissions per the Clean Air Act;
- Discharge to the surface water per the National Pollutant Discharge Elimination System (NPDES); and
- Asbestos, lead-based paint, and radon per Navy regulations.

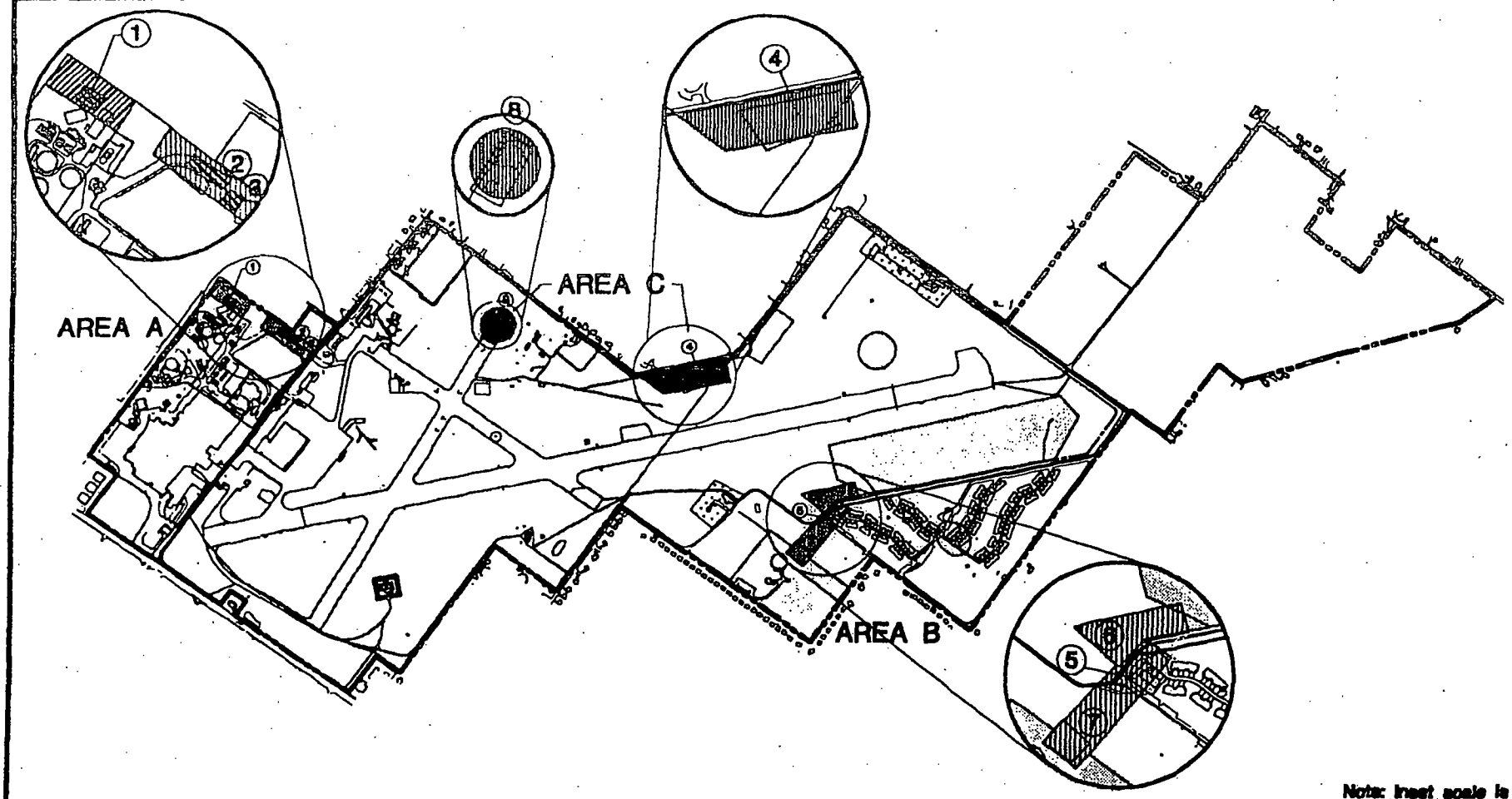
Installation Restoration Program

A Preliminary Assessment, the first step in the Navy's Assessment and Controls of Installation Pollutants Program (NACIPP), was conducted in 1980 to identify areas where waste containing hazardous substances may have been disposed at NAWCAD. (In 1987 the NACIPP became the Installation Restoration Program [IRP].) The areas of concern identified to date at NAWCAD are the eight inactive waste sites listed in Table 3.10-1 and shown on Figure 3.10-1 (Hazardous Waste Areas).

NAWCAD was placed on the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List on October 4, 1989. In accordance with applicable federal and Pennsylvania state laws, the Navy has completed two phases of Remedial Investigation (RI) work to date. The Phase I RI included sampling of soil and groundwater at IRP Sites 1 through 8 (SMC, September 1990). The Phase II RI included additional groundwater investigations at all IRP Sites (Halliburton NUS, April 1993). This investigation found that a CERCLA response action was necessary to address contaminated groundwater in overburden and shallow bedrock attributable to IRP Sites 1, 2, and 3 (Area A) and IRP Sites 5, 6, and 7 (Area B), collectively referred to as Operable Unit 1 (OU-1). A Feasibility Study (FS) was prepared in April 1993 and a Record of Decision (ROD) was signed with the US Environmental Protection Agency (USEPA) in September 1993. The ROD selected an interim remedy that includes pumping and treatment of water to minimize the migration of contaminated groundwater while further RI work is conducted to fully determine the nature and extent of groundwater contamination in Areas A and B.

In April 1993, the Navy initiated sampling of residential, municipal, and commercial wells in the vicinity of NAWCAD, at USEPA's request, to determine if any groundwater used by off-base properties may have been contaminated by past Navy waste disposal activities. The sampling results suggest that Area B and IRP Sites 4 and 8 (Area C) are potential contaminant sources along with an off-base source. In 1993 and 1994 nearby residences were connected to public water systems to ensure that local residents are not exposed to contaminated groundwater. The connection of residences to public water systems was identified as OU-2.

Hazardous Waste Areas



- Building and Number
- Property Boundary
- ① IR Program Site Number
- Category 1: Areas where no storage, release, or disposal has occurred
- Category 2: Areas where only storage has occurred
- Category 5: Areas where storage, release, disposal, and/or migration has occurred and action is underway but not final
- Category 6: Areas where storage, release, disposal, and/or migration has occurred but required response actions have not been implemented
- Category 7: Unevaluated areas or areas requiring additional evaluation

1600 800 0 800 1600
Scale in Feet

400 0 400
Scale in Meters

N

Source: BRAC Cleanup Team and EA Engineering, 1995

Figure 3.10-1

Table 3.10-1

Installation Restoration Program Site Summary Table

Site No.	Description	Type of Hazardous Materials	Date of Operation	Status
1	Burning Pit	Paints, oils, asphalt, roofing material, unspecified chemicals, firing range wastes	1940-1955	ROD for interim remedial action approved[a]
2	Disposal Trench	Industrial wastewater sludges	1965-1970	ROD for interim remedial action approved[a]
3	Burning Pit	Solvents, paints, roofing materials, and unspecified chemicals	1955-1965	ROD for interim remedial action[a]
4	Disposal Trench	Non-industrial solid wastes, paints, waste oils, waste metals, construction debris, solvents, and sewage treatment sludge	1966-1970	RI report completed[a]
5	Disposal Trench	Paints, solvents, scrap metal, and 30 drums of asphalt	1955-1970	ROD for interim remedial action approved[a]
6	Disposal Trench	Paints, solvents, demolition wastes, waste oils, other flammable wastes, and grease trap wastes	1960-1980	ROD for interim remedial action approved[a]
7	Disposal Trench	Industrial wastewater sludge	1950-1955	ROD for interim remedial action approved[a]
8	Firefighting Training Area	Aviation fuel, lubricants, coolants	1961-1988	RI Report completed[a]

Notes:
(a) Work Plan Addenda are prepared to address the data gaps identified during the RI.
RI = Remedial Investigation; ROD = Record of Decision; TBD = To be determined.
All sites are regulated under CERCLA.
Source: BRAC Cleanup Team and EA Engineering, March 1995.

Contaminated shallow groundwater attributable to Area C has been identified as OU-3. A ROD for OU-3, which uses a presumptive remedy of pumping and treating contaminated groundwater, is under final USEPA review.

A Phase III RI work plan addressing data gaps (Haliburton NUS, January 1995) is currently being reviewed. It includes additional RI work (including groundwater sampling) at Sites 1 through 8, as well as a newly identified area, Area 9. This area was allegedly used for the disposal of cut-up fuel tanks and incinerated rubber linings. The Phase III RI work will be implemented as the Navy and USEPA agree on RI work plans for the work of concern. Proposed RI work plans currently under review by the USEPA address potential contaminant sources at Area C (Sites 4 and 8) and Area 9, and groundwater at Area 9.

Compliance Program Status

Compliance activities at NAWCAD are being conducted along with environmental restoration activities. Since NAWCAD is slated for realignment, compliance activities will be coordinated with final property transfer. Compliance activities address storage tanks, polychlorinated biphenyls (PCBs), asbestos, radon, lead, waste management, and water and air discharges. The status of compliance projects at NAWCAD is presented in Table 3.10-2

Storage Tanks

In 1988, Pennsylvania received authority from USEPA to regulate underground storage tanks (USTs). Effective August 1993, USTs and aboveground storage tanks (ASTs) were required to conform with 25 PA Code Chapter 245. The most recent NAWCAD Tank Management Plan (January 1996) outlines current tank usage, capacity, regulating authority, location, and recommendations.

There are currently 32 USTs broken down into the following five categories:

- 17 USTs used to store No. 2 heating oil;
- Six USTs used to store diesel oil;
- Three USTs used to store automobile fuel;
- Five USTs used to store jet fuel; and
- One UST used to store aviation gasoline (to be converted to No. 2 fuel oil storage).

Table 3.10-2

Closure-Related Compliance Projects

Project	Status	Regulatory Program
1. Underground Storage Tanks	Existing tanks are in compliance with Pennsylvania and federal law; federal regulated tanks are tested annually in December. Records from 1986 could not account for approximately 900 gal of fuel oil delivered to the UST at Bldg 16. Evidence of a release could not be found.	Pennsylvania Department of Environmental Protection Regulations; (25 PA Code 245) Act 32; 1989)
2. Asbestos Testing/Removal	Asbestos survey completed in 1993. Removal of Friable, Accessible, and Damaged (FAD) asbestos schedule completed. An Operations and Maintenance Plan will be developed.	US policy for base closure and EPA; 29 CFR Subpart M Sections 61.140-61.1454
3. PCB Storage/Removal	Visual evidence of PCBs leak from the transformer at the PCBs Bldg 85 substation. Cleanup is scheduled to commence; six capacitors and one transformer were removed in 1993. Hydraulic equipment at NAWCAD was not found to contain PCBs. Two PCB-contaminated transformers have been retrofitted.	Toxic Substance Control Act; USEPA Policy
4. Bldg 130 and Bldg 15, 90-day Accumulation Area	Bldg 130 in operation since March 1992. Bldg 15 in operation since January 1993.	RCRA, 40 CFR 262.34; PA Code Title 25 Chapter 262 Subchapter A-D
5. Bldg Decontamination	Bldg 15 is a 90-day Accumulation Area since 1993. Bldg 15 closure completed 5 February 1993.	RCRA, OPNAVINST 5090.1A 9-6.5; PA Code Title 25 265.110-265.115, 40 CFR 265.110-265.115

Project	Status	Regulatory Program
6. Radon	Radon inventory has been completed.	Navy Policy (CNO Hr 11000 Ser N444B/ 5U596033 of 12 Jan 1995 and DOD policies on asbestos, lead paint, and radon at BRAC properties of 31 Oct 1994)
7. Lead	A lead assessment was prepared by the NAWCAD Environmental Programs Office. Three sites are currently considered to be areas of concern for lead.	Navy Policy (CNO Hr 11000 Ser N444B/ 5U596033 of 12 Jan 1995 and DOD policies on asbestos, lead paint, and radon at BRAC properties of 31 Oct 1994)
8. Oil/Water Separators	None on site.	None
9. Solid Waste Management Units	None on site	RCRA
10. NPDES (Discharge to surface water)	Expired on 27 September 1994. WWTP operation under an administrative extension.	Pennsylvania Department of Environmental Protection, Bureau of Water Quality Management, Title 25 Chapter 92; November 1990
11. Air Permits	Currently, NAWCAD has three air permits for classified materials incinerator, Boiler No. 1, and Boiler No. 3. Two of these permits expire on 31 March 1999, and the permit for Boiler No. 3 expired on 31 March 1994. NAWCAD has submitted a renewal application for this permit. Additionally, a Synthetic Minor Air Permit application under the Clean Air Act has been filed (Kurdziel, June 26, 1996).	Pennsylvania Department of Environmental Protection, Air Quality Program PA Code Title 25; March 11, 1995
Source: BRAC Cleanup Team and EA Engineering, March 1995.		

Fifteen of the USTs present at NAWCAD are regulated (state and/or federal). The remaining USTs are used for No. 2 heating oil, and are therefore exempt from state and federal regulation. Federally regulated tanks are precision-tested annually. No leaks have been detected in any of the USTs. As part of the Compliance Program, the UST at Bldg 16 was replaced following the loss of approximately 975 gallons of No. 2 fuel oil. A soil and ground investigation failed to identify any residual contamination.

Two spills occurred at the main boiler plant (Bldg 1) during oil transfer operations to Tanks 5, 6, and 7 on December 28, 1988 and December 31, 1989. During these two spills, oil entered storm drains and flowed to a small unnamed tributary of Little Neshaminy Creek. Spill responses included spill control and cleanup according to Pennsylvania Department of Environmental Protection regulations.

Nine USTs are scheduled for removal in two phases. Phase 1 will remove five USTs at the fuel farm and one UST at the Steam Plant (No. 2 fuel oil, Bldg 21) in the Summer of 1996 (US Navy, January 1996). Three USTs at the auto service station will be removed under Phase 2 between September 1996 and March 1997 and six USTs containing diesel will be emptied/replaced/upgraded or transferred to a new owner by December 22, 1998 (US Navy, January 1996).

A total of 17 ASTs have been identified on-site. Eleven ASTs store No. 2 fuel oil, one stores diesel, four store jet fuel (JP-4), and one stores kerosene. Four No.2 fuel oil, the jet fuel, and the kerosene ASTs are scheduled to be removed by September 1996 (Kurdziel, August 12, 1996).

Polychlorinated Biphenyls (PCBs)

Since 1984, the NAWCAD's PCB compliance program has included:

- Testing transformers for PCBs;
- Retrofitting or removing PCB transformers;
- Removing PCB capacitors; and
- Disposing of PCB-contaminated waste through DRMO contractors in compliance with the TSCA.

Currently, all components at NAWCAD that contained greater than 50 parts per million (ppm) of PCBs have been either retrofitted or removed. The last two PCB transformers (enlisted housing development and Substation 4A-1) were retrofitted in October 1994.

Hydraulic equipment was tested in June 1994 for PCB content. Concentrations of PCBs in all hydraulic fluids tested were below the detection limit of 5 ppm.

Asbestos

Asbestos-containing material (ACM) is regulated by USEPA and the Pennsylvania Department of Environmental Protection. For several years, NAWCAD's Public Works Department has funded a small crew of Philadelphia Naval Shipyard asbestos workers to work at NAWCAD removing asbestos. A field survey and report of ACM on base was prepared (Kimball, 1994). All friable, accessible, and damaged asbestos has been removed. An Operations and Maintenance Plan has been developed for remaining ACM. If additional, friable, accessible and damaged asbestos is discovered prior to the NAWCAD move, it will be removed (BRAC Cleanup Team, 1995) or encapsulated (Kurdziel, June 26, 1996).

Radon

A total of 1,709 alpha-track radon detectors were installed in NAWCAD work areas. Radon levels in excess of the USEPA recommended action guideline of 4.1 picoCuries per liter of air (Pci/l) were reported from 15 detectors. Buildings with at least one detector indicating elevated levels of radon were Nos. 2, 3, 4, 80, and 108. The existing 207 family housing units at NAWCAD were also tested. Two housing units displayed radon concentrations at or in excess of the USEPA recommended action guideline.

Lead

A lead-based paint (LBP) survey was prepared by the NAWCAD Environmental Programs Office from November 11 to December 3, 1993. Over 200 x-ray fluorescent analysis (XRF) tests were conducted throughout Building Nos. 1, 2, 3, 4, 7, and 16 and compared to the HUD guidance levels for lead concentrations (1.0 mg/cm^2). The survey determined that some LBP was present in the buildings at NAWCAD, but insufficient data were available to define the true extent. A more detailed study was recommended, but LBP is not considered to be a hazard unless chipping, peeling, or dusting.

Since April 1988, drinking water from water coolers has been tested for lead. All coolers that reported lead concentrations above the revised Maximum Contaminant Level (MCL) of 0.015 mg/L at the tap were replaced.

Records indicate that there were formerly two aircraft gun ranges and one outdoor small arms firing range in the vicinity of the main runway. The mounds for the small arms range and one of the aircraft ranges have been demolished. A trench exists at the site of the other aircraft range, allegedly formed by the action of projectiles penetrating the ground. These three sites, due to the nature of their past use, are suspected of containing potentially high levels of lead. They will be evaluated further as Phase II EBS review items.

Other Potential Sources Of Contamination/Migration Potential

A search of properties listed on federal and state information systems within a two-mile radius of NAWCAD was performed. Five sites were found on the CERCLA Information System (CERCLIS), two of which have been placed on the National Priorities List (NPL). The two NPL sites, identified as Fisher & Porter and Raymark, and the three other CERCLIS sites are unlikely to have an impact on NAWCAD (EA Engineering, March 1995).

Summary

Section 120(h) of CERCLA requires identification of parcels or locations, owned by the United States and being readied for the sale or transfer, on which hazardous substances were stored in quantities equal to or greater than the reportable quantity for one year or more, known to have been released, or disposed of on the property. Public Law 102-425 (Community Environmental Response Facilitation Act [CERFA]), requires the identification of all uncontaminated real property, or parcels thereof, at installations undergoing closure or realignment. As defined by CERFA, an uncontaminated property is any real property on which no hazardous substances or petroleum products or their derivatives (including aviation fuel and motor oil) were stored for more than one year or more, and there are no known releases or disposals associated with the property. The Environmental Baseline Survey (EBS) completed for NAWCAD defined seven categories as follows:

- Category 1- Areas where no storage, release, or disposal (including migration) has occurred;
- Category 2 - Areas where only storage has occurred;
- Category 3 - Areas of contamination below action levels;
- Category 4 - Areas where all remedial action has been taken;
- Category 5 - Areas of known contamination with removal and/or remedial action underway;
- Category 6 - Areas of known contamination where required response actions have not yet been implemented; and
- Category 7- Areas that are unevaluated or that require further evaluation.

The EBS report indicates that all NAWCAD property falls into one of five categories (Categories 1, 2, 5, 6, 7). Efforts are underway to take the actions necessary to ensure that all NAWCAD property falls into Categories 1 through 4.

Chapter 3
Installation-Wide Environmental Program Status

This chapter summarizes the current status of environmental restoration projects and ongoing compliance activities at NAWC-Warminster. It also summarizes the status of community involvement to date and describes the environmental condition and suitability for transfer of the base property. Table 3-1 summarizes the status of the 8 IR Program sites identified which are currently being investigated. Phase II EBS Review items identified during Phase I EBS are summarized on Table 3-2 and shown on Figure 3-1. A total of 37 underground storage tanks (USTs) have also been identified. Details of these tanks are presented in Table 3-3. The following sections include a brief history of the IR Program as it applies to the Activity, the current status of restoration projects, and the Activity-wide source discovery and assessment status.

3.1
Environmental Program Status

3.1.1
Installation Restoration Program

A Preliminary Assessment, the first step in the Navy's Assessment and Controls of Installation Pollutants Program (NACIPP) was conducted in 1980 to identify areas where waste containing hazardous substances may have been disposed at NAWC-Warminster. In 1987 NACIPP became the Installation Rehabilitation Program (IR Program). Eight sites were identified (IR Sites 1 through 8). Table 3-1 and Figure 3-1 provide a summary and the location of IR Program Sites 1 through 8, respectively.

On 4 October 1989, NAWC-Warminster was listed on the CERCLA National Priorities List, bringing NAWC under the Federal Facilities provisions of Section 120 of CERCLA. On 20 September 1990, the Navy and EPA signed a Federal Facility Agreement for NAWC-Warminster. The Federal Facility Agreement established a procedural framework for developing, implementing, and monitoring appropriate investigations and response actions at NAWC-Warminster in accordance with CERCLA, Superfund Amendments and Reauthorization Act (SARA), the National Contingency Plan (NCP), Resource Conservation and Recovery Act (RCRA), and applicable state laws.

In accordance with the Federal Facility Agreement, the Navy has completed two phases of Remedial Investigation (RI) work to date. A Phase I RI completed on 11 September 1990,

included sampling of soil and ground water at IR Program Sites 1 through 8. The Phase II RI was initiated in late 1991 and included additional ground water investigations at IR Program Sites 1 through 8. This RI work found a CERCLA response action was necessary to address contaminated ground water in overburden and shallow bedrock attributable to IR Program Sites 1, 2, and 3 (Area A) and IR Program Sites 5, 6, and 7 (Area B), collectively referred to as Operable Unit 1 (OU-1). The findings of Phase I and Phase II RI work for OU-1 were included in an RI report for OU-1 released on 19 April 1993.

The Navy released a Feasibility Study (FS) report for OU-1 on 21 April 1993, and subsequently signed an ROD for OU-1 with EPA on 29 September 1993. The ROD for OU-1 selected an interim remedy which included the pumping and treatment of ground water to minimize contaminant migration while further RI work was conducted to fully determine the nature and extent of ground water contamination at Areas A and B. The remedial design for the interim remedy was initiated on 28 July 1993 and is planned for completion in September 1994. The start of construction for the interim remedy is planned for early 1995.

On 28 April 1993, the Navy initiated sampling of off-Base residential wells to assess the potential impact of contaminated ground water attributable to NAWC on offsite ground water users. Sampling has continued on a regular basis since that time. Based on the results of sampling to date, the Navy has installed water treatment systems in homes and connected homes to public water systems. While the sampling results suggest that Area B and the area of IR Program Sites 4 and 8 (Area C) are potential contaminant sources, the results also suggest a potential off-Base source. In response, on 14 July 1993, a Removal Action Memorandum was signed by EPA, authorizing EPA to connect additional residences in affected areas to public water systems. The connection of residences to public water systems has since been identified as OU-2.

RI work plans addressing data gaps identified in the Phase I and Phase II RI reports are being developed at this time and include additional RI work at Sites 1 through 8 as well as a newly identified Area 9 (Figure 3-1). Area 9 was identified through recent interviews with NAWC-Warminster personnel and aerial photograph interpretation and was allegedly used for the disposal of cut-up fuel tanks and incinerated rubber linings.

Portions of these Phase III RI work plans have been agreed to by the Navy and EPA and are being implemented by the Navy at this time. This RI work includes the additional investigation of ground water at Areas A, B, and C. Contaminated, shallow ground water attributable to Area C has been identified as OU-3. An RI/FS for OU-3 is targeted for completion in September 1994.

The Phase III RI work shall be implemented as the Navy and EPA agree on RI work plans for the work of concern. Proposed RI work plans currently under review by the EPA

address potential contaminant sources at Area C (Sites 4 and 8) and Area 9, and ground water at Area 9. Additional RI work plans under development by the Navy at this time address remaining data gaps identified in the Phase I and Phase II RI reports.

3.1.2
Installation-Wide Source Discovery and Assessment Status

A Phase I EBS was conducted for NAWC-Warminster to identify additional sites requiring further action to supplement the ongoing IR Program. Results of this Phase I EBS are presented in the CERFA Report. Phase II EBS Review items are listed in Table 3-2 and shown on Figure 3-1.

3.2
Compliance Program Status

Compliance activities at NAWC-Warminster are being conducted along with environmental restoration activities. Since NAWC-Warminster is slated for realignment, compliance activities from here on will be conducted in coordination with closure and mission/operations. Compliance activities address USTs, hazardous materials management, asbestos, polychlorinated biphenyls (PCB), water, and air discharges. The status of compliance projects at NAWC-Warminster is presented in Table 3-4.

3.2.1
Storage Tanks

A total of 19 aboveground storage tanks (ASTs) have been identified onsite (Figure 3-1). These tanks can be classified into four categories:

1. Tanks Used to Store No. 2 Fuel Oil—A total of 12 ATS are used to store No. 2 fuel oil for heating purposes.

2. Tanks Used to Store Diesel Fuel—A total of two ASTs are used to store diesel fuel for emergency generators.

3. Tanks Used to Store Jet Fuel—A total of four ASTS tanks are used to store jet fuels (JP-4, JP-5). Jet fuels are used for various purposes such as research development, test, and evaluations. Jet fuels were used in the past for fire training exercises.

4. Tank Used to Store Kerosene—One AST onsite is currently used to store kerosene for emergency conditions.

Table 3-5 presents the list of the ASTs onsite. As shown on Table 3-5 seven of these ASTs are state regulated and are in compliance with the PADER regulations. The Hazardous Material/Hazardous Waste Spill Prevention, Control, and Countermeasure Plan for these tanks has been prepared by NAWC-Warminster to comply with 40 CFR Parts 116, 151, and 265 and the PADER hazardous waste regulations.

A total of 35 USTs have been identified onsite (Figure 3-1). These USTs can be classified into five categories:

1. USTs Used to Store No. 2 Fuel Oil—Twenty USTs are used to store No. 2 fuel oil for heating oil purposes.

2. USTs Used to Store Diesel Fuel—Seven USTs are used to store diesel fuels. Diesel fuel is used for vehicle operations, heating, and emergency generators.

3. USTs Used to Store Gasoline—Two USTs are used to store gasoline for vehicle operations.

4. USTs Used to Store Jet Fuel—Five USTs are used to store jet fuel (JP-5) for aircraft operations. Three of these USTs are no longer in use. Upon closure of the airfield, these five USTs will be removed. At that time a site assessment will be performed.

5. USTs Used to Store Aviation Gasoline—One UST is used to store aviation gasoline for the NAWC-Warminster Flying Club.

A total of 27 regulated (Pennsylvania State and/or Federal) USTs are present at NAWC-Warminster. The federal regulated tanks are precision tested annually. Results of these tests, which have not indicated any leaks in the tanks being used at the time, are maintained at NAWC-Warminster Environmental Programs office. One tank (Tank 18) was removed in 1993. As part of the Compliance Program, the UST at Building No. 16 was replaced following the loss of approximately 975 gal of No. 2 fuel oil. A soil and ground water investigation was performed to assess contamination due to this leak. From these investigations, no contamination was found.

Two spills occurred at the main boiler plant (Building No. 1) during oil transfer operations to Tanks 5, 6, and 7. The first spill occurred in 28 December 1988. The second spill occurred

on 31 December 1989. During these two spills, oil entered storm drains and flowed to a small unnamed tributary of Little Neshaminy Creek. NAWC-Warminster reported these two spills to PADER and Bucks County Department of Health. Spill responses included spill control and cleanup according to PADER regulations.

3.2.2 Hazardous Waste Management

The nature and extent of hazardous substance/waste management programs during initial construction and tenure of Brewster Aeronautical Corporation is unknown.

The Navy designed and constructed the Industrial Waste Treatment Facility (Building No. 259) in 1945. This apparently modified an existing treatment system installed by Brewster Aeronautical Corporation during the early 1940s. The separate industrial waste collection system was installed during initial construction. Industrial waste sludge was accumulated in eight earthen lined sludge beds adjacent to the current Sewage Treatment Plant. In 1973, two concrete-lined sludge lagoons were constructed and the previous sludge beds were removed. The location of the eight former earthen sludge beds is contiguous with IR Program Site 1 and is being investigated under the IR Program. The removed sludge was disposed, allegedly in IR Program Site 7.

The analytical laboratories located in Building No. 2 were moved to NAWC-Warminster from the Philadelphia Naval Base in 1970-1972. Laboratory sinks in these areas were connected to the industrial waste collection system. Disposal method of laboratory chemicals between 1970 and 1981 is unknown.

Reported disposal practices from 1940 to 1980 consisted of onsite waste burn pits, disposal trenches, and landfills. Sites of early disposal have been identified and are being addressed under the IR Program.

NAWC-Warminster undergoes periodic environmental compliance audits which assess compliance with applicable federal and state environmental regulations.

NAWC-Warminster has a Hazardous Material Control and Management Program, consisting of a Hazardous Material Control Committee and an authorized Hazardous Material Use List. A continuing review of materials in use is scheduled to identify less hazardous substitutes. A list of laboratory chemicals, quantities, and locations is maintained at the Activity.

NAWC-Warminster is a Large Quantity Generator (RCRA Hazardous Waste Generator No. PA6170024545 under RCRA. The hazardous waste generated at the Activity is often a by-

product of laboratory research, development, test, and evaluation experiments. Wastes include overage chemicals, paint, cleaning solvents, waste oil, solutions of heavy metals, acids, and alkalis. NAWC-Warminster has established a management policy for handling, disposing, and recycling hazardous materials/hazardous wastes. Hazardous wastes are collected for disposal at the 90-day storage facilities, Building Nos. 130 and 15 which are located in Zone 1 of the excess area.

Hazardous waste currently generated by the Activity is disposed by Defense Reutilization and Marketing Office contractors in compliance with RCRA and PADER regulations.

3.2.3 Polychlorinated Biphenyls

Since 1984, NAWC-Warminster's PCB compliance program included:

- Testing transformers for PCB
- Retrofitting of PCB transformers
- Removal of PCB-contaminated capacitors
- Disposal of PCB/PCB-contaminated waste through Defense Reutilization and Marketing Office contractors in compliance with the Toxic Substances Control Act (TSCA).

Currently, records indicate that the following two transformers contain PCB:

- Transformer 4A-1 (Building No. 35).
- Housing substation transformer.

The Navy is planning to retrofill both of these PCB-contaminated transformers in 1994 according to the TSCA regulations.

Records also indicate that Transformer A-1 has leaked. Visual inspection revealed black stains on the concrete pad on which Transformer 4A-1 is located. This will be addressed during the Phase II EBS.

The hydraulic equipment at NAWC-Warminster has been tested for PCB content. Results did not indicate the presence of PCB in the hydraulic equipment.

3.2.4 Asbestos

Asbestos-containing material (ACM) is regulated by EPA and PADER. The field survey for ACM inventory has been completed. The preliminary draft inventory report detailing the location of ACM as well as its condition was prepared in November 1993. A schedule for removing friable, accessible, and damaged (FAD) ACM will be developed in 1994 in compliance with Navy policy. An Operations and Maintenance Plan will be developed for the remaining ACM.

3.2.5 Solid Waste Management

NAWC-Warminster is in compliance with PADER solid waste management regulations. Solid waste generated by NAWC-Warminster is currently disposed offsite by a private contractor. The contractor is responsible for disposal method/location. The contract is awarded by NAWC-Warminster based on competitive bids. The contract mandates the contractor to follow the federal, PADER, and local regulations. Recycling efforts a NAWC-Warminster include precious metals recovery, scrap metal recycling, high grade (computer) paper recycling, and plain paper recycling.

3.2.6 Radon

Approximately 1,700 alpha-track radon detectors have been installed in work areas of the Activity. The locations and dates of installation of detectors have been recorded and plotted on drawings. The radon inventory is scheduled to be completed by the second quarter of 1994. The existing 207 family housing units at NAWC-Warminster have been tested, with only one unit showing radon concentrations in excess of the EPA recommended action level of 4 picocuries per liter. Remedial actions at this housing unit showing excess concentrations of radon has been completed.

3.2.7 Lead-Based Paint

A lead-based paint assessment of NAWC-Warminster was prepared by the Environmental Programs Office. During the assessment, approximately 200 non-destructive analyses were

performed throughout Building Nos. 1, 2, 3, 4, 7, and 16 in 1993. At the same time an assessment was performed at Housing Units A - H. A statistical evaluation of lead-based paint locations and quantities is being developed from the results.

Records indicate that there were formerly two aircraft gun ranges and one outdoor small arms firing range in the vicinity of the main runway. The mounds for the small arms range and one of the aircraft ranges have been demolished. A trench exists at the site of the other aircraft range, allegedly formed by the action of projectiles penetrating the ground. These three sites, due to the nature of their past use, are suspected of containing potential high levels of lead. They will be investigated during the Phase II EBS.

3.2.8
Oil/Water Separators

There are no oil/water separators at NAWC-Warminster.

3.2.9
Resource Conservation and Recovery Act Facilities Solid Waste Management Units

To date, there are no RCRA Solid Waste Management Units identified onsite.

3.2.10
National Pollutant Discharge Elimination System Permits

The first National Pollutant Discharge Elimination System (NPDES) permit was obtained by NAWC-Warminster in 1980 to discharge the treated effluent from the onsite sewage treatment plant. Treated effluent is discharged through an outfall pipe which runs parallel to the old Ivyland/New Hope railroad line northward to a discharge point past Bristol Road into an unnamed tributary to the Little Neshaminy Creek. This sewage treatment plant was built by Brewster Aeronautical Corporation and was transferred to and modified by the Navy in 1945. The NAWC-Warminster Sewage Treatment Plant is a secondary/trickling filter treatment plant with two active trickling filters.

The first NPDES permit expired on 2 February 1985. Between 1985 and 1989, the first permit was administratively extended while the permit renewal application was being processed. The permit was renewed on 27 September 1989.

The following permits were obtained from PADER:

Permit No.	Issue Date	Expiration Date
PA0022420	2 February 1980	2 February 1985
PA0022420	27 September 1989	27 September 1994

The discharge criteria set forth in the NPDES permit were not consistently met by NAWC-Warminster particularly for ammonia and nitrogen. The Pennsylvania Environmental Defense Foundation filed a lawsuit on 5 September 1991 under the provisions of Clean Water Act seeking injunctive relief and civil penalties for non-compliance with the NPDES permit. A consent decree was entered in the United States District Court for Eastern District of Pennsylvania on 1 May 1992 in which the Navy agreed to send sanitary wastewater to the publicly owned treatment works operated by Warminster Municipal Authority.

NAWC-Warminster has a Warminster Township Municipal Authority permit to discharge 20,000 gal daily of sanitary wastewater. This permit was obtained on 10 September 1993. NAWC-Warminster anticipates discharging wastewater from the Activity to Warminster Township Municipal Authority.

The Navy also has a general stormwater discharge permit for the activities in this region. NAWC-Warminster is in the process of preparing a site-specific stormwater discharge permit application.

3.2.11 Air Permits

NAWC-Warminster had four air permits as required by PADER for the classified materials incinerator, pathological incinerator, Boiler No. 1, and Boiler No. 3. The classified materials incinerator, pathological incinerator, and Boiler No. 1 have been permitted since the 1980s. The air permit for the pathological incinerator was not renewed as it is inactive. Boiler No. 3 has been permitted since 1986.

The following active air permits were obtained from PADER:

Description No.	Permit No.	Issued Date	Expiration Date
Classified Materials Incinerator	09-301-099	12 OCT 1993	31 MAR 1999
Boiler No. 1	09-302-609	11 NOV 1993	31 MAR 1999
Boiler No. 3	09-302-054	23 MAY 1989	31 MAR 1994*
* A renewal application has been prepared and filed by the activity with PADER.			

3.3 Natural and Cultural Resources Program Status

3.3.1 Natural Resources

In accordance with the Environmental and Natural Resources Program Manual (OPNAVINST 5090.1A of 2 October 1990), and Real Estate and Natural Resources Management Procedural Manual (NAVFAC P-73, Vol II) and the Natural Resources Management Program (DODDIR 4700.4 of 24 January 1989), the Navy prepared a Natural Resources Management Plan (NRMP) in 1991.

The NRMP is a five-year planning document that guides ecologically sound and cost effective management of natural resources to maximize benefits for the installation and neighboring community. The Natural Resources Management Plan consists of the following sections:

A. Land Management
B. Forest Management
C. Fish and Wildlife Management
D. Outdoor Recreation Resources Management.

Only the Fish and Wildlife Management and Land Management sections are applicable to NAWC-Warminster.

The Fish and Wildlife section includes a Fish and Wildlife Cooperative Agreement signed by the U.S. Fish and Wildlife Service.

The Land Management section establishes procedures to ensure compliance with state non-point source pollution control plan in all activities, including construction, land management projects, and operational requirements.

An inventory of species of concern and significant natural communities of NAWC-Warminster was prepared by the Nature Conservancy Pennsylvania Science Office in May 1992. A major objective of the study was to supply information to the Activity that would facilitate its compliance with federal, Department of Defense, and Department of the Navy regulations dealing with rare species and their habitats. The study concluded that NAWC-Warminster did not contain any significant natural communities and that the presence of plant and animal species of concern is highly unlikely. A draft wetlands plot was forwarded to the U. S. Fish and Wildlife Service, June 1993, for review.

3.3.2
Cultural Resources

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. This involves (1) identification and evaluation of historic properties; (2) assessment of effects; and (3) consultation and agreement on ways to avoid, minimize, or mitigate adverse effects.

In accordance with OPNAVINST 5090.1A, a Historical and Archeological Resource Protection Plan was completed in August 1991. In addition, a Cultural Resource Survey will identify and evaluate historic properties. This survey will be conducted by a consultant retained by Northern Division. It will begin by 30 April 1994, and be completed by 30 September 1994.

3.4
Environmental Condition of Property

In order to prepare an environmental condition of property map, reliable and accurate information regarding the storage, release, and disposal of hazardous substances or petroleum products must be gathered and analyzed. The data evaluation allows categorization into seven area types which are as follows:

1. **Areas Where No Storage, Release, or Disposal (including Migration) Has Occurred**—This area type is defined as follows: a geographically contiguous and mappable area where the results of investigations show that no hazardous substances or petroleum products were stored, released into the environment or site structures, or disposed on site property. A determination of this area type cannot be made, however, unless a minimum level of information gathering and assessment has been completed. In accordance with Section 120(h)(4) of CERCLA as amended by CERFA, all such determinations (i.e., "uncontaminated") of this type must be made on the basis of a records search of the area in question and adjacent property, a review of the chain of title documents for the area, a review of aerial photographs of the area, a visual inspection of the area and adjacent property, interviews with current and former employees regarding inspection of the area and adjacent property, and interviews with current and former employees regarding their knowledge of past and current activities on the property. These efforts are (or can be) functionally accomplished via an EBS (or properly scoped preliminary assessment) of the property in question. If information gathered from these efforts indicates that hazardous substances or petroleum products have been released, disposed, or stored in the area, the geographic location becomes one of the other area types.

2. **Areas Where Only Storage Has Occurred**—This area type is defined as follows: a geographically contiguous and mappable area where the results of investigations show only that storage of hazardous substances or petroleum products has occurred. A determination of this area type must be made in accordance with the same requirements in Section 120(h)(4) of CERCLA, as listed in the above paragraph.

3. **Areas of Contamination Below Action Levels**—This area type is defined as follows: a geographically contiguous and mappable area where environmental evidence demonstrates that hazardous substances or petroleum products have been stored, released, or disposed, but are present in quantities that require no response action to protect human health and the environment. Such quantities of hazardous substances or petroleum products can be below defensible detection limits, or can be above detection limits but below action levels. **Below action levels** means, in the absence of installation-specific risk-based or standards-based criteria, that the concentration of any hazardous substance or petroleum constituent **does not exceed** chemical-specific ARARs.

Designation of this area type also means that risk estimates completed for contamination do not:

- Exceed 10^{-6} for any carcinogenic hazardous substances or petroleum constituent
- Result in hazard quotient above 1 for any non-carcinogenic hazardous substance or petroleum constituent
- Exceed 10^{-6} for all carcinogenic hazardous substances and petroleum constituents, taken together, in any exposure pathway
- Result in a hazard index above 1 for all non-carcinogenic hazardous substances and petroleum constituents, taken together, in any exposure pathway
- Exceed 10^{-4} for all carcinogenic hazardous substances and petroleum accumulated across pathways.

Note that a designation of a Type 3 area cannot be made with confidence unless a minimum level of information gathering and assessment has been completed. As such, all determinations should be made on the basis of a site inspection or equivalent level of effort, which includes biased field sampling and laboratory analysis to support a conceptual understanding of the area.

4. **Areas Where All Remedial Action Has Been Taken**—*This type is* defined as follows: a geographically contiguous and mappable area where all remedial actions necessary to protect human health and the environment have been taken. Type 4 areas include those areas in which an EBS documents evidence that hazardous substances are known to have been released or disposed on the property, but all remedial actions necessary to protect human health and the environment with respect to any hazardous substances remaining on the property have already been taken to meet the provisions of CERCLA Section 120(h)(3). Clarification on the meaning of "all remedial action has been taken" is found in Section 120(h)(5)(B)(i) of CERCLA. The BRAC Cleanup Team preparing suitability of property for transfer maps should be aware that "all remedial action has been taken" means that the construction and installation of an approved remedial design has been

completed, and the remedy has been demonstrated to EPA to be operating properly and successfully (in practice, usually a year).

5. **Areas of Known Contamination With Removal and/or Remedial Action Under Way**—This area type is defined as follows: a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances or petroleum products (including derivatives) are confirmed based on the results of sampling and analysis in electronic databases and/or environmental restoration and compliance reports. By definition, this area type contains contaminant concentrations above action levels. Such concentrations do not meet the criteria that would allow a determination of a Type 3 area. Remedial systems for Type 5 areas are partially or entirely in place, but have not been fully demonstrated.

6. **Areas of Known Contamination Where Required Response Actions Have Not Yet Been Implemented**—This area type is defined as follows: a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances or petroleum products (including derivatives) are confirmed based on the results of sampling and analysis as contained in electronic databases and/or environmental restoration and compliance reports. This area type contains concentrations of contaminants above action levels. Such concentrations do not meet the criteria that would allow a determination of a Type 3 area. Additionally, required remedial systems have not been selected or implemented.

7. **Areas that Are Unevaluated or that Require Further Evaluation**—This area type is defined as follows: a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances or petroleum products (including derivatives) are suspected, but not well characterized, based on the results of a properly scoped records search, chain of title review, aerial photography review, visual inspection, interviews with current and former employees, and possibly sampling and analysis. They do not, with certainty, fit any of the previous area types because evaluation efforts have not occurred, are ongoing, or are inconclusive.

Figures 3-2 summarizes the status of information on the environmental conditions of Activity property in terms of the categories described above. The map has been color-coded to correspond to the seven classifications.

3.4.1
Areas Where No Storage, Release, or Disposal Has Occurred (WHITE)

Areas receiving this designation were determined by default based on the Phase I EBS. Zone 4 falls under this description (Figure 3-2).

3.4.2
Areas Where Only Storage Has Occurred (BLUE)

Currently, there are no areas at NAWC-Warminster which meet this description.

3.4.3
Areas Where Storage, Release, Disposal, and/or Migration Has Occurred, but Require No Remedial Action (LIGHT GREEN)

Currently, there are no areas at NAWC-Warminster which meet this designation.

3.4.4
Areas Where Storage, Release, Disposal, and/or Migration Has Occurred, and All Remedial Actions Have Been Taken (DARK GREEN)

Currently, there are no areas at NAWC-Warminster which meet this designation.

3.4.5
Areas Where Storage, Release, Disposal, and/or Migration Has Occurred and Action is Underway but Not Final (YELLOW)

Currently, there are no areas at NAWC-Warminster which meet this designation.

3.4.6
Areas Where Storage, Release, Disposal, and/or Migration Has Occurred, but Required Response Actions Have Not Been Taken (RED)

Areas falling into this designation are the IR Program sites (Figure 3-2).

3.4.7
Unevaluated Areas or Areas Requiring Additional Evaluation (GRAY)

Figure 3-2 presents the areas requiring additional evaluation.

3.4.8
Suitability of Property for Transfer by Deed

From the information shown in Figure 3-2, it is evident only Zone 4 can be transferred by deed provide that notice of storage of CERCLA hazardous substances for one year or more is contained in the deed in order to satisfy CERCLA 120(h) requirements. As of this date, a policy of subdividing parcels for deeded transfer has not been prepared by the Real Estate arm of the Component BRAC Organization. Currently, the Navy is in the process of developing the property reuse plans. Chapter 2 presents the anticipated actions for transferring the property.

3.5
Status of Community Involvement

Community relations activities that have taken place at NAWC-Warminster are included in Table 3-6.

3.5.1
Environmental Impact Statement Process

An Environmental Impact Statement is required to be completed within 12 months from the date the community submits its final reuse plan. A single National Environmental Protection Act (NEPA) analysis will be prepared to support decisions regarding both disposal and reuse of the installation. The Environmental Impact Statement for Warminster will be a 2-phase contract planned to start by 30 April 1994:

- Phase 1—Existing conditions survey of the NEPA requirements.
- Phase 2—Once a reuse plan has been proposed (or if none proposed assume a reasonable reuse scheme) an Environmental Impact Statement will be prepared for the impact of reuse.

3.5.2
Federal Facility Agreement Process

NAWC-Warminster entered into a Federal Facility Agreement with EPA Region III on 20 September 1990.

3.5.3
Information Repositories

A public repository for information had been established at Bucks County Library, 150 South Pine Street, Doylestown, Pennsylvania 18901 (215-348-9081) and at NAWC-Warminster Public Affairs Office. This repository contains information relative to the environmental cleanup at NAWC-Warminster.

3.5.4
Administrative Record

An Administrative Record File has been established at NAWC-Warminster in accordance with CERCLA requirements. A copy of the Administrative Record File Index is included in the information repositories (Section 3.5.3).

3.5.5
Community Relations Plan

A Draft Community Relations Plan has been completed for NAWC-Warminster in February 1994 to address the issues of concern in the environmental restoration process and has been submitted to EPA Region III for comment. The Draft Community Relations Plan facilitates communication to the concerned federal, state, or local agencies; public representatives; and local residents. This communication ensures that the parties involved or interested are provided accurate, consistent information in a timely manner concerning related contaminants and cleanup activity. Information was obtained from interviews with residents, community leaders, and regulatory agencies to develop the Community Relations Plan for NAWC-Warminster.

3.5.6
Technical Review Committee/Restoration Advisory Board

The Technical Review Committee was formed on 23 January 1989 and has met regularly since its formation. Members of the Technical Review Committee include representatives from NAWC-Warminster, PADER, EPA Region III, Bucks County, Warminster Township, Northhampton Township, Upper Southhampton, and Ivyland Township. The NAWC-Warminster Restoration Advisory Board (RAB) is an outgrowth of the Technical Review Committee and was officially established in December 1993. This group has been meeting regularly since 9 December 1993. It is anticipated that the RAB will be expanded to include other concerned groups.

3.5.7
Technical Assistance Grant

The EPA has not received Technical Assistance Grant applications from local community groups as of this revision date.

3.5.8
Mailing List

A mailing list of interested parties in the community was prepared and is updated regularly.

3.5.9
Fact Sheets

Fact sheets describing the status of the IR Program at NAWC-Warminster are under development for issuance in the Spring of 1994.